

 pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION	MEETING NOTES 13 Feb 2018	Commonwealth of Pennsylvania Department of Environmental Protection Southeast Regional Office Environmental Cleanup and Brownfields
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Site: NVF Manufacturing Facility 400 Mulberry Street Kennett Square, PA 19348		eFACTS Facility ID: 731803	Tank Facility ID: 15-17015
		Incident ID: n/a	NIR Date: 8 Jun 2010
Municipality: Kennett Square Borough	County: Chester	Location: 39.8421°N, 75.7165°W	
Owner: Delaware Valley Development Co. 726 Yorklyn Rd., Suite 150 Hockessin, DE 19707		Consultant: Environmental Alliance 5341 Limestone Rd. Wilmington, DE 19808	
Contact: George Beer (302-235-2500 x12)		Contact: Paul Miller (302-234-4400)	

Attendees:		Date: 7 Feb 2018
DVDC	George Beer, Austin Beer	
Environmental Alliance	Paul Miller, Chris Thoeny	
PA DEP	Patrick Patterson, Ragesh Patel, David Brown, Randall Maud	

Meeting Date: 2/7/2018, 1:30 PM

Meeting Place: DEP Norristown

Sign in Sheet (attached)

Site History / Involvement – George Beer

DVDC first involvement in 2005; acquired property through bankruptcy in 2010.

RI and Cleanup Plan approved 2010

DVDC decommissioned equipment and demolished buildings, over 400,000 square feet and 24 storage tanks.

Resins, solvents and asbestos were removed before demolition. An underground storage tank and press pit containing PCBs were located within and adjacent to the building along the north side of the property.

Remediation has focused on PCBs, which were widespread, and lesser impacts of lead and arsenic which were localized.

About 8,300 tons of soils have been removed to achieve remediation goals. Wastes were trucked to Michigan and taken to Oklahoma via railcar for disposal. Environmental Alliance explained the post-excavation sampling that was performed. Analyses have included seven PCB aroclors.

Currently, there four small areas remain where PCBs are known to exceed the remediation goals (< 1 ppm – residential and 50 ppm – nonresidential)

- 2 small areas exceed 50 ppm PCBs near the Outfalls along the southern property boundary adjacent to the Railroad tracks.
- 1 small area along the right-of-way of Mulberry Street where 2 samples showed PCBs exceed 1 ppm (2.8 ppm and 48 ppm)
- 1 small area in the southeast corner (Cedar Road) where two samples showed PCBs exceeding 1 ppm (1.2 ppm and 2 ppm)

Further excavation in these areas was limited by concerns about the structural integrity of adjacent features (railroad tracks, roadways, and utility lines). Liner material was put down to show the limits of horizontal and vertical excavation.

The remediators intend to cap the soil on the western side of the property.

The property is being conceptually planned for future mixed residential development and commercial development. PCBs in soils have been removed to less than 1 ppm in the eastern area planned for future residential development (~90 %) of the property. Except as noted above, PCBs in soils have been removed to less than 50 ppm in the western areas planned for future commercial development (~10% of the property). Currently the property is zoned for commercial use and discussions about residential re-zoning are ongoing.

Previous history included an EPA PCB soil removal action (1993 and 1994) along the railroad and a tributary leading to Red Clay Creek (~7,400 tons). A separate EPA removal action disposed PCB containing materials (soils, drums, circuit boards, etc.) from the adjoining Kennett Square Junkyard (~1,600 – 2,000 tons).

During excavation, a larger than expected volume of PCB-impacted soils were found especially along the pipeline leading to the Former Outfall. PCBs > 50 ppm extended to depths of 12 to 14 feet along the pipeline leading to the Former Outfall. To the extent practical, based on structural considerations, PCBs > 50 ppm were removed. The pipeline was also removed.

We discussed that PCBs are regulated by EPA under TSCA. PCBs are not covered under the DEP's Memorandum of Understanding with EPA relative to RCRA sites. The PCB Coordinator for EPA Region III is Kelly Bunker (Bunker.Kelly@epa.gov, 215-814-2177).

We discussed with the remediators:

- Need to follow requirements in TSCA 761
- The potential benefits of using composite sampling strategies.
- EPA's authority for PCBs extends to impacted media beyond soil and groundwater, which are the environmental media in DEP's Act 2.

We recommended the remediators:

- Evaluate potential PCB concentrations remaining in the concrete slabs and underground piping.
- Notify EPA's TSCA section of the cleanup performed. (DEP will also communicate with EPA.)
- Include EPA on future correspondence related to this property.
- Consider a future meeting including DEP and the borough.

The remediators are looking to submit a Final Report regarding Soils in the near future. We discussed options to get to that end point which would need to include having the remedy in place for any areas exceeding the applicable standards, based on planned future use. Options discussed included a minimum of 2 feet of clean fill, or perhaps paving to eliminate potential exposure pathways.

We also discussed the need to evaluate potential for vapor intrusion (VI) given the known presence of some volatile compounds in soil and in groundwater. We discussed that the vapor assessment should follow criteria in DEP's January 2017 Guidance. Mitigation is a possible option, but would have some constraints regarding performance testing, continued operation and deed restrictions. The remediators agreed to evaluate their data and assess options.

The remediators are looking to move forward to complete an attainment demonstration for groundwater. We discussed the need for 2-inch minimum diameter monitoring wells for attainment sampling. Several wells are being replaced because they were destroyed during demolition or soil remediation. DEP agreed that additional wells for offsite delineation did not appear to be required. They are planning for eight quarters but may seek a reduction depending on the results.

We mentioned that the junkyard is adjacent to the NVF property. The former lagoon area was lined and monitoring wells were installed around the lagoon area for groundwater monitoring.

[Notes prepared by R. Maud and edited by C. D. Brown.]